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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
TERRANCE JOHN COX,  
AKA TJ COX,  
  
Defendant.

CASE NO. 1:22-CR-00214 ADA-BAM

STIPULATION AND PROTECTIVE ORDER  
BETWEEN THE UNITED STATES AND  
DEFENDANT

COURT: Hon. Barbara A. McAuliffe

WHEREAS, the discovery in this case is voluminous and contains a large amount of personal and confidential information including but not limited to dates of birth, telephone numbers, residential addresses, social security numbers and other confidential information ("Protected Information"); and

WHEREAS, the parties desire to avoid both the necessity of large scale redactions and the unauthorized disclosure or dissemination of this information to anyone not a party to the court proceedings in this matter;

The parties agree that entry of a stipulated protective order is appropriate.

THEREFORE, Defendant TERRANCE JOHN COX, by and through his counsel of record ("Defense Counsel"), and the United States of America, by and through Assistant United States Attorneys Henry Z. Carbajal III and Jeffrey A. Spivak, hereby agree and stipulate as follows:

1. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, and its general supervisory authority.

2. This Order pertains to all discovery provided to or made available to Defense Counsel as part of discovery in this case (hereafter, collectively known as “the discovery”).

3. By signing this Stipulation and Protective Order, Defense Counsel agrees not to share any documents that contain Protected Information with anyone other than Defense Counsel attorneys, designated defense investigators, and support staff. Defense Counsel may permit the Defendant to view unredacted documents in the presence of his attorney, defense investigators, and support staff. The parties agree that Defense Counsel, defense investigators, and support staff shall not allow the Defendant to copy Protected Information contained in the discovery, except as agreed to by the United States of America (“Government”). The parties agree that Defense Counsel, defense investigators, and support staff may provide the Defendant with copies of documents from which Protected Information has been redacted.

4. To the extent possible, to alleviate the time burden associated with defense counsel redacting Protected Information to give defendant copies of discovery documents, the government will endeavor to identify categories of documents and/or Bates ranges of produced discovery documents that may be provided to the defendant for temporary review without redaction.

5. The discovery and information therein may be used only in connection with the litigation of this case and for no other purpose. The discovery is now and will forever remain the property of the Government. Defense Counsel will return the discovery to the Government or certify that it has been shredded at the conclusion of the case.

6. Defense Counsel will store the discovery in a secure place and will use reasonable care to ensure that it is not disclosed to third persons in violation of this agreement.

7. Defense Counsel shall be responsible for advising the Defendant, employees, and other members of the defense team, and defense witnesses of the contents of this Stipulation and Order.

8. In the event that Defendant substitutes counsel, undersigned Defense Counsel agrees to withhold discovery from new counsel unless and until substituted counsel agrees also to be bound by this Order.

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1 IT IS SO STIPULATED.

2 Dated: September 12, 2022

PHILLIP A. TALBERT  
United States Attorney

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4 By: /s/Henry Z. Carbajal III  
HENRY Z. CARBAJAL III  
JEFFREY A. SPIVAK  
Assistant United States Attorney

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7 Dated: September 12, 2022

By: /s/ Mark Coleman  
MARK COLEMAN  
Attorney for Defendant  
TERRANCE J. COX

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11 IT IS SO ORDERED.

12 Dated: September 12, 2022

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE